

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

June 10, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza
Courtroom 820
Central Islip, NY 11722

Re: Cardenas v. Vinny's General Contracting Inc., et ano.
Case No.: 2:25-cv-1248 (SIL)

Dear Judge Locke:

This firm represents the Plaintiff Alonso Cardenas ("Plaintiff") in the above-referenced case. The Plaintiff writes to respectfully request an adjournment of the initial conference scheduled to proceed on June 12, 2025 at 11:00 AM.

Pursuant to ¶ 2(B) of this Court's Individual Motion Practices, Plaintiff respectfully submits that:

- (i) the original date is set forth above;
- (ii) the reason for the request is because your undersigned is scheduled to appear before the Supreme Court of the State of New York, Appellate Term, Second Department for oral argument on an unrelated appeal at 9:30 AM in White Plains, NY on June 12, 2025;
- (iii) Defendants consent to the requested adjournment;
- (iv) there have been no previous requests for an adjournment of this conference, although this Court *sua sponte* adjourned the conference once;
- (v) Plaintiff respectfully submits that good cause exists based on the conflict due to a previously scheduled oral argument on an appellate matter;
- (vi) Plaintiff inquired with Defendant about three (3) available dates, but did not receive a response.

In light of the foregoing, Plaintiff respectfully submits that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
June 10, 2025

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Plaintiff
Alonso Cardenas

VIA ECF

The Law Office of Michael James Prisco PLLC
By: Michael Prisco, Esq.
187 Veterans Boulevard
Massapequa, NY 11758
michaelprisco@mjpesq.com

Attorneys for Defendants
Vinny's General Contracting Inc., and
RJS Construction & Development Inc.